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March 14, 2018

Hon. Brian M. Cogan  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re:     United States of America v. Juan Carlos Ramirez-Abadía  
a/k/a “Chupeta” Criminal Nos. 04-1064(S-3) (BMC) and  
09-772 (BMC)**

**APPLICATION FOR A FIRST STATUS CONFERENCE FOLLOWING  
REASSIGNMENT OF CASE**

Dear Judge Cogan:

I am one of the defense attorneys for the defendant in the above-captioned matters, Juan Carlos Ramirez-Abadía. I write the following letter to the Court in support of the within application for a first status conference before the Court following the reassignment of this matter to Your Honor’s docket after our community’s loss of the Honorable Sandra L. Townes.

**(i) THE CASE**

The defendant was indicted in the United States District Court, District of Columbia along with other defendants reputed to be the leaders of Colombia’s North Valle Cartel. This indictment came to be known among law enforcement officials and concerned defense attorney practitioners as the “National Rico Case”, against these individuals all or most of whom also had stand-alone indictments naming them alone and/or charging conduct with their own significant Drug Trafficking Organizations. The defendant was also indicted in the within Eastern District of New York Indictment, which came to be known the “Brooklyn CCE Case”. The defendant’s combined matters and long-term investigations which led to these Indictments were among the most significant and historic narcotics-related prosecutions in this district and in the United States.

In August of 2007 the defendant was apprehended in Brazil in connection with Provisional Arrest Warrants related to the aforementioned Indictments and first appeared in this district for arraignment on or about August 25, 2008. On or about March 1, 2010 the defendant

plead guilty pursuant to an agreement under FRCP Rule 20 transferring the National Rico Case to this District for further proceedings and that case was reassigned the Eastern District of New York Case No. noted above. The sentencing of the defendant has been held in abeyance since that date.

**(ii) THE WITHIN APPLICATION**

The parties have been in frequent discussions surrounding many issues with respect to this matter and because of its nature we felt it would be appropriate to schedule a first status conference to apprise the Court of:

- (i) The reasons why the sentencing of the defendant should be continued to be held in abeyance;
- (ii) The relationship of this case to other significant matters pending before your Honor;
- (iii) While this case was designated as a complex case by Judge Townes on September 10, 2008, there are currently no disputed or outstanding legal issues. However, the defendant, a late middle-aged man who suffers from several serious, chronic health problems, has had trouble obtaining expeditious specialized treatment at his current place of custody. We would seek to discuss this with the Court. We would also file a brief letter application with a sealing component and a Proposed Order directing that facility to promptly obtain these treatments for the defendant. I would file this application and Proposed Order on or before the close of business on Thursday March 29, 2018, one week before Thursday April 5, 2018 a date that Your Honor's Case Manager has identified as being practical for the Court in terms of calendaring this conference.

Therefore, we respectfully request that the Court grant this request for a first status conference in this matter and that this conference be scheduled for Thursday April 5, 2018 at 9:45 a.m. a date and time identified by Your Honor's Case Manager as available and practical for the Court. This application is made with the consent of all parties.

Respectfully Submitted,



Paul R. Nalven

CC: BY ECF  
A.U.S.A. Andrea Goldbarg  
David Zapp, Esq  
Johana Zapp, Esq

CC: BY MAIL  
Juan Carlos Ramirez-Abadia